





TOPICS



1. Discuss the sophisticated Fresh Processed Produce Operations at Taylor Farms – for a *purpose*
2. Discuss the Taylor Farms operations as a type of Mexican operation in the context of FDA's Import Food Safety Plan
3. Discuss ways USDA can assist in promoting the future of fresh processed produce and can spur FDA on to a risk based import program to level the field

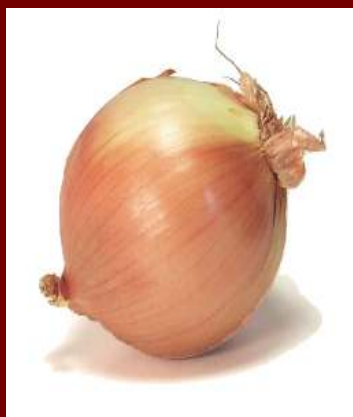
Taylor Farms- Mexico Plant 2007





TAYLOR FARMS MEXICO

FRESH PROCESSED READY TO EAT Vegetables





Processed ready to eat vegetables

RANCH PROCESS



5 year field history required for consideration (prior use, crops, pesticides...)

Taylor Farms risk analysis of each new ranch is conducted by a trained auditor.
Routine Taylor Farms internal audits of ranches



Irrigation water tested by outside lab (Silliker) on all water sources for *E. coli* and coliforms – worst case scenarios

Third party audit (by NSF Davis Fresh) and hosted on prime labs international data base.



7 days prior to harvesting: Pre-harvest audit of the ranch and testing of product is conducted. Expires after 7 days – Expiration requires reinspection/retesting

Strict GAP Program which exceeds California's Leafy Green Agreement.



Taylor Farms Agriculture department evaluations of raw product to assure Food Safety, Quality and phytosanitary conditions.

Raw product pathogen testing by outside lab (Silliker) on leafy greens.



All growers must abide by EPA chemical and pesticide standards. Constant auditing of chemical and pesticide usage.

Constant pesticide testing on raw product and water sources (by outside lab Silliker and Cesaveg).



Processed ready to eat vegetables



HARVEST PROCESS

Taylor Farms internal audit of harvest crew

Micro testing of all contact surfaces by outside lab (Silliker)

Third party audit of harvest crew (by NSF Davis Fresh)

Internal ATP testing of all product contact surfaces

Strict Good Harvesting Practices program enforced

Product Harvested into pre-washed plastic bins

Harvest crews controlled by Taylor Farms

Quality inspector in each harvest crew to assure food safety, quality and phytosanitary conditions.

Bins covered by tarp in transport to plant



Processed ready to eat vegetables



QC Release Process

No harvested product is able to enter Taylor Farms' plant for processing unless all prior QC steps are conducted and testing & auditing results & reports are available in the QC data system for visual inspection

The QC Release status for every shipment is visible to all Regional Plants to ensure no unreleased product is further distributed



PROCESSED READY TO EAT FRESH PRODUCE

QUALITY DEPT INSPECTION





PROCESSED READY TO EAT VEGETABLE



All Fresh Processed (Finished) vegetables go through a state of the art water agitation and washing system using 200 ppm free chlorine to shock worms or insects causing them to detach from the product, after which they are filtered out and discarded.

Flotation washing machine uses the latest state-of-the-art European technology is specially developed for the washing of vegetables.



PROCESSED READY TO EAT BROCCOLI





PROCESSED READY TO EAT BROCCOLI WORM/INSECT DRUM





PROCESSED READY TO EAT BROCCOLI DEWATERING/CLORINATED SPRAY BAR



PROCESSED READY TO EAT SPRING MIX





PROCESSED READY TO EAT BROCCOLI



And then is run through a second identical system. There is discharge of impurities taking place continuously in these systems. The recycled water in the bath wash is constantly filtered and water from the spray bars is always fresh, clean water. Fresh water is being pumped into the system through the spray bars at a rate of 10 gallons per minute. Quality department again samples product to insure quality and phytosanitary conditions.



PROCESSED READY TO EAT BROCCOLI

QUALITY DEPT SAMPLES WASHED PRODUCT





PROCESSED READY TO EAT BROCCOLI



Product is then taken to our flume wash where it is submerged in chlorinated water by a paddle mechanism this has duration of two minutes and then transferred to a dewatering belt where a final rinse is applied. This second system has a water capacity of 2340 gallons and is being replenished by fresh water from the final rinse spray which pumps water in at 10 gallons per minute. In this system water is 100% replenished every 4 hours.



PROCESSED READY TO EAT BROCCOLI





PROCESSED READY TO EAT BROCCOLI

BAGGED/SEALED/METAL DET. BOXED





PROCESSED READY TO EAT BROCCOLI

Q.A. INSPECTS BAGGED BROCCOLI





FEDERAL REGULATORY (CESAVEG) INSPECTS PRODUCT FOR PHYTOSANITARY CERTIFICATE





PROCESSED READY TO EAT BROCCOLI

EFFECTIVNESS OF PROCESS

From October 11th to January 22th , 212 shipments have been sent to United States representing over 5 million pounds of finished product in which no worms have been discovered by Federal Regulated Inspectors (CESAVEG), USDA border inspectors or end users.





PROCESSED READY TO EAT VEGETABLES

BENEFITS

High Quality, Safe, Secure, Traceable, Transparent
fresh-produce growing, harvesting, processing, and
transportation

Year round supply of safe fresh produce for American
consumer





PROCESSED READY TO EAT VEGETABLES

IN CONTEXT OF FDA IMPORT SAFETY

Increase in Mexican fresh produce and fresh processed produce will only increase – dramatically – over the next several years. Now is the time to begin preparing.

The location where food safety risks are assessed (source vs. border) must be addressed now before the quantity of shipments explodes even further beyond the capacity of USDA or FDA to inspect.





PROCESSED READY TO EAT VEGETABLES

IN SHORT

Taylor Farms and many other fresh produce processors are undertaking tremendous steps to ensure their products are safe

Currently, however, the U.S. Government fails to assign any value to those processes and, instead, inspects at the border product from Taylor and similar high quality produce operations at rates that are unjustifiably high

This results in lower inspection rates of truly high-risk imported fresh produce and creates the unlevel playing field for all compliant fresh produce companies





ROLES FOR USDA

Promoting Risk-Based Solutions

Farm and Facility Inspections & Product and Water Testing should be relied upon in increasing measure and border inspections should be reduced for products coming from similar operations

Reliance upon audits conducted by trusted third parties (whether independents, other governments, US government agencies, or auditing customers)

Documented food safety programs, like those at Taylor Farms should enjoy significantly reduced FDA and USDA inspection rates at the border crossing





ROLES FOR USDA

Promoting Risk-Based Solutions

1. Working with FDA and DHHS in implementing those portions of the Food Import Safety Plan that rely upon risk-based solutions to target border inspections
2. Work with FDA to conduct on-site Mexican fresh produce field and facility audits to document compliance with U.S. requirements and expectations
3. Creating and expanding product classifications to take into consideration fresh produce processing that eliminates the risks associated with fresh produce and so eliminate the need for mandatory border inspections





ROLES FOR USDA

Promoting Risk-Based Solutions

4. For instance, there is no USDA classification for fresh processed broccoli: Just fresh broccoli, which requires inspection of each load as it crosses
5. Creating new classifications for fresh processed vegetables that have had the traditional safety and agriculture risks eliminated would enable these products to pass USDA and FDA at the border without routine inspection: Yet this is wholly justified. And shipments can still be audited at some low frequency to ensure the system is operating within acceptable ranges





ROLES FOR USDA

Promoting Risk-Based Solutions

6. Whatever risk-based programs FDA (and USDA) implement going forward, we believe the standards for those programs should be set high for granting expedited border releases of fresh produce
7. Some procedures must be in place to validate risk-based programs at the source are actually reducing risks of contamination





DISCUSSION & QUESTIONS

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